

1 The Honorable James L. Robart
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 CLAIRE DOUGLAS and MARY JOAN
16 ISABELL, individually, on behalf of
similarly situated individuals,

v.
17 Plaintiffs,

18 BANK OF AMERICA, N.A., a national
19 banking association,

20 Defendant.

21 No. 2:20-cv-00193-JLR

22 **STIPULATION AND [PROPOSED]
23 ORDER EXTENDING DEADLINES
FOR (1) CLASS CERTIFICATION
DISCOVERY, (2) RENEWED MOTION
FOR CLASS CERTIFICATION, AND
(3) RESPONSIVE PLEADINGS**

24 Noted for Consideration:
January 5, 2021

25 **I. BACKGROUND**

26 In an Order filed on November 19, 2020, the Court, *inter alia*, (1) granted Plaintiffs' motion to amend their complaint, (2) denied without prejudice Plaintiffs' motion for class certification and (3) set new deadlines for completing class discovery and filing a renewed motion for class certification. *See* Dkt. No. 100. Pursuant to that Order, class discovery must be completed by January 22, 2021, and a renewed motion for class certification must be filed by February 22, 2021.

27 After Plaintiffs filed their amended complaint on December 3, 2020, Dkt. No. 101, 28 the parties entered serious settlement discussions. Those discussions continue, and the 29

1 parties have agreed to jointly request extensions of the pending deadlines to facilitate
2 that process.

3 **II. STIPULATION**

4 1. Plaintiffs filed their Second Amended Complaint on December 3, 2020.
5 The parties agree that, subject to approval by the Court, Bank of America does not need
6 to respond to that pleading until February 22, 2021.

7 2. In order to facilitate the ongoing settlement discussions between the
8 parties, Bank of America and Plaintiffs agree, subject to Court approval, that the deadline
9 to complete discovery on class certification issues set forth in docket No. 100 should be
10 extended to March 22, 2021.

11 3. In addition, the parties agree that, subject to Court approval, the deadline
12 for Plaintiffs to renew their motion for class certification set forth in docket No. 100
13 should be extended to April 22, 2021.

14 DATED: January 4, 2021.

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STIPULATION AND ORDER EXTENDING
CERTAIN DEADLINES- 3

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III. ORDER

Based on the stipulation of the parties and for good cause shown, the deadline to complete discovery on class certification shall be extended from January 22, 2021 to March 22, 2021 and the deadline for Plaintiffs to file a renewed motion for class certification shall be extended from February 22, 2021 to April 22, 2021. Defendant Bank of America shall file a responsive pleading to Plaintiffs' Second Amended Complaint by February 22, 2021.

DATED this 11th day of January, 2021.


James L. Robart
United States District Judge

Presented by:

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STIPULATION AND ORDER EXTENDING
CERTAIN DEADLINES- 4

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STIPULATION AND ORDER EXTENDING
CERTAIN DEADLINES- 5

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